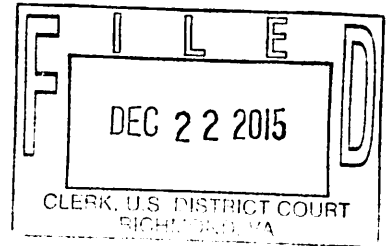


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA

v.

DAVID WAYNE SCHNEIDER,

Defendant.

Criminal No. 3:15-cr- 201

18 U.S.C. §§ 1343 & 2

Wire Fraud

(Count 1)

26 U.S.C. § 7206(1)

Tax Fraud

(Count 2)

18 U.S.C. § 641

Theft of Government Property

(Count 3)

18 U.S.C. § 981

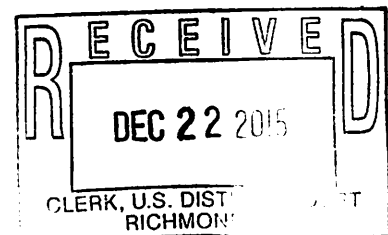
Criminal Forfeiture Allegation

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
(Wire Fraud)

From in or about January 2010, through in or about January 2015, in the Eastern District of Virginia and elsewhere, defendant DAVID WAYNE SCHNEIDER, and others known and unknown, knowingly and intentionally devised and intended to devise a material scheme and artifice to defraud the United States Department of the Treasury, Internal Revenue Service ("IRS"), and to obtain money by means of false and fraudulent pretenses, representations, and promises, which scheme and artifice, and the execution thereof, were in substance as follows:



1. SCHNEIDER and his co-conspirators were hired to prepare and file tax returns for certain individual customers. SCHNEIDER and the co-conspirators prepared and filed electronically false and fraudulent federal income tax returns claiming refunds with the IRS in the names of the individual customers. SCHNEIDER and the co-conspirators included false and fictitious information that was not provided by the individual customers on these tax returns. SCHNEIDER and the co-conspirators made bank accounts SCHNEIDER controlled available to receive electronically deposited tax refunds expected as a result of filing false tax returns.

2. SCHNEIDER and the co-conspirators prepared and filed, and caused to be prepared and filed electronically with the IRS, federal income tax returns that contained false entries as to individuals' income, Schedule C self-employment business losses and gains, dependents, and education expenses. These false entries caused the IRS to issue refunds to these individuals. SCHNEIDER and the co-conspirators kept part of the issued refunds and paid the remainder over to the taxpayers.

3. As a result of this scheme, SCHNEIDER filed or caused the filing of at least one hundred and twenty-nine (129) false tax returns with the IRS claiming \$515,104.74 in fraudulent refunds.

4. In or about January 2014, in the Eastern District of Virginia and elsewhere, for the purposes of executing and carrying on this scheme to defraud, and attempting to do so, DAVID WAYNE SCHNEIDER did knowingly and with the intent to defraud, cause to be transmitted in interstate commerce, by means of wire and radio communications, certain writings, signs, signals and sounds, that is the electronic filing of S.R.'s 2013 tax return from SCHNEIDER's computer in Richmond, Virginia to Turbo Tax in Mountain View, California, and then to the IRS Service

Center in Martinsburg, West Virginia.

(In violation of Title 18, United States Code, Sections 1343 & 2.)

COUNT TWO
(Tax Fraud)

In or about April 2012, in the Eastern District of Virginia and within the jurisdiction of this Court, the exact date being unknown, defendant DAVID WAYNE SCHNEIDER did willfully make and subscribe a United States Individual Tax Return, for himself, for tax year 2011, which was verified by a written declaration that it was made under penalty of perjury and which DAVID WAYNE SCHNEIDER did not believe to be true and correct as to every material matter. The IRS Form 1040 for tax year 2011, filed with the IRS, stated a zero taxable income, when in fact, as the defendant then and there knew, he had a taxable income in gambling winnings of over \$100,000 for tax year 2011.

(In violation of Title 26, United States Code, Section 7206(1))

COUNT THREE

(Theft of Government Property)

Beginning in or around January 2005, and continuing to in or around January 2015, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, DAVID WAYNE SCHNEIDER, did knowingly and willfully steal, purloin, and convert to his own use, on a recurring basis, money belonging to the United States, namely, more than \$1,000 in Social Security Disability Benefits and United States Department of Health and Human Services Medicare Benefits, to which he was not entitled.

(In violation of Title 18, United States Code, Section 641.)

CRIMINAL FORFEITURE ALLEGATION

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that upon conviction of the offenses charged in Counts One and Three of this Information, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offenses.

Property subject to forfeiture includes, but it not limited to, the following:

The sum of at least \$768,460.71, representing the proceeds of the offenses charged, to be offset by the forfeiture of any specific property, constituting substitute assets for proceeds.

If property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c).)

DANA J. BOENTE
UNITED STATES ATTORNEY

By: Margaret W. Reed
Margaret W. Reed
Special Assistant United States Attorney